

DONALD C. BREY

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April 22, 2013

Robin Kelly  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: Republican Senate Campaign Committee (RSCC) FEC Form 9  
(09/26/2012 – 10/14/2012), Received 10/11/2012  
Identification Number: C30002026

Dear Ms. Kelly,

I am legal counsel to and write on behalf of Matthew Yuskewich and the Republican Senate Campaign Committee (RSCC) in connection with your request for additional information regarding the filing of a Form 9 on 10/11/2012 regarding the time period 9/26/2012 through 10/14/2012.

The RSCC is a "legislative campaign fund" as defined under Ohio law. Ohio Rev. Code §3517.10(D)(3)(d) describes a legislative campaign fund as follows:

Each state political party shall have only one legislative campaign fund for each house of the general assembly. Each such fund shall be separate from any other funds or accounts of that state party. A legislative campaign fund is authorized to receive contributions and make expenditures for the primary purpose of furthering the election of candidates who are members of that political party to the house of the general assembly with which that legislative campaign fund is associated. Each legislative campaign fund shall be administered and controlled in a manner designated by the caucus. . . .

In other words, the RSCC is operated for the benefit of state and local candidates for election as Republican members of the Ohio Senate. As a non-federal committee that seeks to influence only non-federal elections, the RSCC has never needed to file a Form 9 with the FEC until the 2012 elections. Thus, those involved with the RSCC did not have the knowledge and experience with the Form 9 requirements that those regularly involved with federal campaigns would presumably have.

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